



City of San Antonio Ethics Review Board Annual Report – 2011



City Ordinance 88874, approved on November 19, 1998, created the Ethics Review Board, which met for the first time on April 30, 1999. A City Charter election held in May 2004, and the adoption of a City Campaign Finance Regulation ordinance in August 2004, necessitated the modification of the responsibilities and jurisdiction of the Ethics Review Board. A new ethics ordinance (City Ordinance 100283) was adopted by City Council on January 13, 2005. The Charter amendment formally dissolved the board created by the 1998 ordinance and established an independent board with the ability to deliver binding rulings and impose sanctions and fines. The initial members of this new board were appointed in April 2005.

In the year 2011, the Board met as a body twice. There were two Complaints and one Request for Opinion, resulting in three Determinations/Opinions rendered by the Board (see Attachment A). The City Attorney's Office rendered ten Advisory Opinions (see Attachment B). (The complete text of each Determination and/or Opinion can be obtained from the Office of the City Clerk; the extracts provided in the attachments to this document are for information purposes only). A list of registered lobbyists – current as of December 10, 2011 – has been provided by the City Clerk (see Attachment D).

As an element of our Annual Report, the Ethics Review Board is charged with submitting recommended changes to the Ethics Code and Campaign Finance Regulations. In June of 2009, City Council modified the Ethics Code, adopting all the changes proposed by the Board, the City Attorney's Office and the Office of the City Clerk in previous reports. As a result, last year there were few proposed changes/corrections to the Code. These proposals were not acted upon by Council so they will be resubmitted with one addition. The majority of these changes are required to bring the Code in alignment with state or federal law, to enhance clarity or to make administrative corrections, and the Board recommends that they be approved and incorporated into the Code. There are also several substantive changes that are recommended that the Board feels would improve the Code and these are included in Attachment C for your consideration. (Red-lined copies of the Code and Campaign Finance Regulations are attached as Attachments F & G, with all proposed changes/corrections, both administrative and substantive.).

Ethics/Campaign Finance Training in 2011: Training on the Municipal Campaign Finance Regulations and City's Election Campaign Finance filing system are presented by the Office of the City Clerk and Office of the City Attorney. In March of 2006, the San Antonio City Manager adopted a program of mandatory annual ethics training for all City employees. As part of this program, refresher training is to be performed biannually. Comprehensive training on the Texas Election Code, Municipal Campaign Finance Code and the city's electronic campaign finance filing system was presented by the Texas Ethics Commission, City Attorney's Office, Office of the City Clerk and ITSD in January. Ethics training was also conducted at three Municipal Leadership Institute sessions. The City Attorney's Office also made twice-monthly Ethics presentations at the mandatory new employee orientation. Additionally, other workshops and presentations on Ethics were conducted by the City Attorney's Office in 2011 (see Attachment E).

The members of the Board believe that the Code and the ethics review process will continue to create affirmative change in city governance and in our citizens' perception of the same. The Board also feels that the mandatory ethics training for City employees conducted by the City Attorney's office has been very beneficial in reducing ethics violations and combined with the advisory opinions issued by the City Attorney's Office and the Ethics Review Board have resulted in increased awareness of and compliance with the City's Code of Ethics.

The Ethics Review Board Members – 2011

The following persons were confirmed by the City Council to serve on the Ethics Review Board for the terms indicated.

<u>NAME</u>	<u>APPOINTED BY</u>	<u>DATE APPOINTED</u>	<u>DATE TERM EXPIRES</u>
Tomas A. Larralde	Mayor	May 5, 2005	Apr. 25, 2010
Steven G. Marquez	District 1	Nov. 5, 2009	Apr. 25, 2013
Dolores Lott	District 2	Apr. 14, 2005	Apr. 25, 2011
Michael S. Ariens**	District 3	Jun. 16, 2005	Apr. 25, 2012
August Stephen Johnson	District 4	Apr. 14, 2005	Apr. 25, 2012
Victor Guevera	District 5	Feb. 4, 2010	Apr. 25, 2013
Richard Bird	District 6	Apr. 14, 2005	Apr. 25, 2012
Elizabeth Benavides Melson	District 7	Apr. 14, 2005	Apr. 25, 2012
Charles Saxer	District 8	Dec. 4, 2008	Apr. 25, 2013
Arthur J. Downey*	District 9	Apr. 14, 2005	Apr. 25, 2010
Ron C. Campos	District 10	Nov. 19, 2009	Apr. 25, 2013

* Chair

** Vice-Chair

Attachment A

Ethics Determinations – 2011

Number	Date	Complaint & Opinion
Opinion 11-01	January 20, 2011	On January 20, 2011 a Sworn Complaint of Ethics Violations was filed by Ms. Tina Cortez, a Citizen of the City of San Antonio, against Jennifer Ramos, an elected official of the City. This complaint alleged various violations of the City's Ethics Code. On the 4 th day of April 2011, a panel of the whole of the Ethics Review Board of the City of San Antonio convened in a formal hearing to consider this complaint. At that hearing, the Ethics Review Board found that the allegations of violations of Sections 2-43, 2-44, 2-47 and 2-48 of the Ethics Code, as contained in the Complaint, were not supported by a preponderance of the evidence; however the Board did find by a preponderance of the evidence, that the following section of the Code was violated: Section 2-49, Ethics Code dated June 25, 2009. The evidence provided to the Ethics Review Board showed that Ms. Ramos had used the city's email system to conduct work related to her private employment. Pursuant to Section 2-87(f) (7) of the Ethics Code, a Letter of Admonition was issued to her. A Letter of Admonition may be issued when the Ethics Review Board finds that a violation of the Ethics Code has occurred, but also finds that the violation was minor and/or may have been unintentional or inadvertent.
Opinion 11-02	June 7, 2011	On March 28, 2011 a Sworn Complaint of Ethics Violations was filed by Richard Griffing, a Citizen of the City of San Antonio, against Elisa Chan, an elected official of the City. This complaint alleged various violations of the City's Ethics Code. On the 7 th day of June 2011, a panel of the whole of the Ethics Review Board of the City of San Antonio convened in a formal hearing to consider this complaint. At that hearing, the Ethics Review Board found that the allegations of violations of Sections 2-44, 2-47 and 2-54 of the Ethics Code, as contained in the Complaint, were not supported by a preponderance of the evidence. It was therefore the opinion of the Board that the Complaint be dismissed.

Attachment B

Ethics Advisory Opinions – 2011 (City Attorney’s Office)		
Number	Date	Questions
11-01	January 3, 2011	<i>May a city employee evaluate a proposal submitted by a firm that employs the child of the employee?</i>
11-02	January 28, 2011	<i>May a City-appointee to the Metropolitan Transit Board of Trustees board sell insurance to members of other city-created boards and commissions?</i>
11-03	February 15, 2011	<i>May City staff accept complimentary Sea World Tickets from the company as part of their participation in an animal adoption event?</i>
11-04	March 31, 2011	<i>May the spouse of a member of the City’s Cultural Arts Board apply for and receive arts funding from the City?</i>
11-05	May 31, 2011	<i>May a former city employee enter into a discretionary contract with the City within one year of the termination of their employment with the City?</i>
11-06	May 4, 2011	<i>May an employee of the Animal Care Services Department accept complimentary tickets to a movie premiere from a former animal rescuer?</i>
11-07	September 23, 2011	<i>May a city employee who owns an outside business enter into a contract to provide services to the City through his outside business?</i>
11-08	June 16, 2011	<i>May a city official accept an invitation to participate in a golf tournament, if the entity inviting the employee is not doing or seeking to do business with the City, and is not registered as a lobbyist?</i>
11-09	October 3, 2011	<i>May a former city employee provide professional engineering services as a component of a discretionary contract with the city?</i>
11-10	November 21, 2011	<i>May a city employee attend a holiday party given by a company who has a contract with the city?</i>
Ethics Advisory Opinions – 2011 (Ethics Review Board)		
Number	Date	Questions
11-01	September 7, 2011	<i>May a law firm that represents clients in zoning cases before the City, an officer of that firm or an attorney employed by that firm make a political contribution to any councilmember or candidate or political action committee that supports or opposes a city councilmember or candidate from the time the zoning application is submitted to the city until 30 calendar days after final action on the application by the Zoning Commission or City Council?</i>

Attachment C

Proposed Amendments to the Ethics Code – 2011

As an element of our annual report, the Ethics Review Board is charged to submit recommended changes to the Ethics Code and Campaign Finance Regulations. As noted in the Introduction section, many of the changes previously proposed by the Ethics Review Board were adopted by the City Council on June 25, 2009. Red-lined copies of the Code and Campaign Finance Regulations are attached (Attachments F & G) with all proposed changes/corrections, both administrative and substantive. Listed below are the more substantive changes for your consideration. The majority of these proposed changes were also included in our 2010 Annual Report.

CODE OF ETHICS

SECTION 2-42 DEFINITIONS

- (a) *Entity*. "Entity" means a sole proprietorship, partnership, firm, corporation, holding company, joint-stock company, receivership, trust, unincorporated association, or any other entity recognized by law, ~~including non-profit entities~~.
- (u) *Official*. Except in Division 5 (Lobbyists), the term "official" or "city official" includes the following persons:
- The Mayor;
 - Members of the City Council;
 - Municipal Court Judges and Magistrates;
 - The City Manager;
 - Deputy City Manager;
 - Assistant City Managers;
 - Assistants to the City Manager;
 - City Clerk;
 - Deputy City Clerk;
 - Assistant to the City Clerk;
 - Senior Deputy Court Clerk;
 - Deputy Court Clerk;
 - All department heads and assistant department heads;
 - Internal Auditor and all assistant internal auditors;
 - ~~Market Square Superintendent;~~
 - Assistant to City Council;
 - Assistant to Mayor;
 - ~~Secretary to City Manager;~~
 - Executive Secretaries;
 - ~~Community Action Manager;~~
 - Public Utilities Supervisor; and

Members of all boards, commissions (except the Youth Commission whose members are minors), committees, and other bodies created by the City Council pursuant to federal or state law or City ordinance, including entities that may be advisory only in nature, who are appointed by City Council or who are designated in the by-laws or organization papers of the entity to serve on behalf of the city; and board members of any entity who are appointed by the City Council to such board membership.

This list is subject to amendment annually by the *Human Resources Department*. As such, consultation with the Human Resources Department to verify whether a person is included in this list is strongly recommended.

The term “official” has a different meaning in Division 5 (Lobbyists), which is defined in Section 2-62(a) of that Division. The term “officer” is defined in Section 2-52(e)(2) of Division 2 (Prohibited Interests in Contracts) and Section 2-58(c)(2) of Division 3 (Discretionary Contracts) and is not synonymous with any use of the term “official” in this code.

SECTION 2-43 CONFLICTS OF INTEREST

(a) **General Rule.** To avoid the appearance and risk of impropriety, a city official or employee shall not take any official action that he or she knows is likely to affect the economic interests of:

(8) ~~An~~ business entity, ~~or nonprofit entity~~, for which the city official or employee serves as an officer or director or in any other policy making position, ~~other than nonprofit boards~~ to which the official or employee is appointed by the city council or city management as a ~~non~~-voting member to represent the best interests of the city, if the action is related to an item pertaining to the City, and the city official or employee would be involved in the negotiation, development or implementation of that item on behalf of the City; or

The ERB committee desires to remove the phrase “non-profit”, because it does not matter whether or not an entity is a “business entity” or a “nonprofit entity”, it is nevertheless an entity. The phrase “non-profit” tends to confuse the issue. Many of the boards created by the city to serve city purposes are not in fact non-profit organizations. The issue remains that a city official/employee can sit at both sides of the table, serving two interests, for either a business entity board or a nonprofit board. The city/employee board member shall be permitted to cast votes, but must recuse themselves on items where they would otherwise be sitting across the table from themselves, negotiating/developing/administering the item that they voted on as a board member.

SECTION 2-74 CONTENTS OF FINANCIAL DISCLOSURE REPORTS

Each initial or annual financial disclosure report shall disclose, on a form provided by the city, the following information:

- (a) ~~the~~The reporting party’s name;
- (b) ~~the name of any person related as parent, child, (except a child who is a minor), or spouse to the reporting party;~~ The reporting party’s employer(s);
- (c) ~~the name of any member of the reporting party’s household not disclosed under subsection (2) of this rule;~~ The name of any entity (including self employment in the form of a sole proprietorship under a personal or assumed name) in which the reporting party or his or her spouse holds an economic interest;

(d) ~~the name of any employer of any person disclosed under subsections (1) or (2) of this rule;~~
The name of any business which the reporting party knows is a partner, or a parent or subsidiary entity of an entity owned by, operated by, or managed by the reporting party or his or her spouse;

(e) ~~the name of any business entity (including self employment in the form of a sole proprietorship under a personal or assumed name) in which the reporting party or his or her spouse holds an economic interest;~~

The name of any person or business entity from whom the reporting party or his or her spouse, directly or indirectly:

(1) Has received and not rejected an unsolicited offer of subsequent employment, or

(2) Has accepted an offer of subsequent employment which is binding or expected by the parties to be carried out.

(f) ~~the name of any business which the reporting party knows is a partner, or a parent or subsidiary business entity, of an business entity owned, operated, or managed by the reporting party or his or her spouse;~~ **The name of each nonprofit entity or other entity in which the reporting party serves as an officer or director, or in any other policy making position;**

(g) ~~the name of any person or business entity from whom the reporting party or his or her spouse, directly or indirectly:~~

~~1. has received and not rejected an unsolicited offer of subsequent employment; or~~

~~2. has accepted an offer of subsequent employment which is binding or expected by the parties to be carried out;~~

The name of each entity which has sought city business, has a current city contract or anticipates seeking city business in which the reporting party, the reporting party's parent, child or spouse is known to directly or indirectly own:

(1) Ten (10) percent or more of the voting stock or shares of the entity, or

(2) Ten (10) percent or more of the fair market value of the entity.

(h) ~~the name of each nonprofit entity or other business entity in which the reporting party serves as an officer or director, or in any other policy making position;~~

The name of any entity of which the reporting party or the reporting party's parent, child or spouse, or entity disclosed under (g) is known to be:

(1) A subcontractor on a city contract;

(2) A partner; or

(3) A parent or subsidiary entity

- (i)** ~~the name of each business entity which has sought city business, has a current city contract or anticipates seeking city business in which any individual listed in subsection (1) or (2) is known to directly or indirectly own:~~
- ~~1. ten (10) percent or more of the voting stock or shares of the business entity; or~~
 - ~~2. ten (10) percent or more of the fair market value of the business entity;~~

The name of each source of income, other than dividends or interest, amounting to more than five thousand dollars (\$5000) received during the reporting period by the reporting party or his or her spouse, unless the source has been disclosed under (b) through (h):

- (j)** ~~the name of any business entity of which any individual or entity disclosed under subsections (1) or (9) is known to be:~~
- ~~1. a subcontractor on a city contract;~~
 - ~~2. a partner; or~~
 - ~~3. a parent or subsidiary business entity.~~

Real property not used as a legal residence. The identification by street address, or legal or lot-and-block description, of all real property located in the State of Texas in which the reporting party or his or her spouse has a leasehold interest, a contractual right to purchase, or an interest as: Fee Simple owner; Beneficial Owner; Partnership Owner; Joint Owner with an individual or corporation; or owner of more than twenty-five (25) percent of a corporation that has title to real property.

- (k)** ~~the name of each source of income, other than dividends or interest, amounting to more than five thousand dollars (\$5000) received during the reporting period by the reporting party or his or her spouse, unless that source has been disclosed under subsections (1) through (10) of this rule;~~

The name of persons or entities to whom the reporting party or spouse owes an unsecured debt of more than five thousand dollars (\$5000), except debts for:

(1) Money borrowed from a family member from his or her own resources; and

(2) Revolving charge accounts.

- (l)** ~~the identification by street address, or legal or lot-and-block description, of all real property located in the state in which the reporting party or his or her spouse has a leasehold interest, a contractual right to purchase, or an interest as: fee simple owner; beneficial owner; partnership owner; joint owner with an individual or corporation; or owner of more than twenty-five (25) percent of a corporation that has title to real property. There is no requirement to list any property:~~
- ~~1. used as a personal residence of a peace officer;~~

- ~~2. over which the reporting party has no decision power concerning acquisitions or sale; or~~
- ~~3. held through a real estate investment trust, mutual fund, or similar entity, unless the reporting party or his or her spouse participates in the management thereof;~~

The name of each person, entity, or other organization from whom the reporting party, or his or her spouse, received a gift with an estimated fair market value in excess of one hundred dollars (\$100) during the reporting period and the estimated fair market value of each gift.

- (m)** ~~the name of persons or entities to whom the reporting party or spouse owes an unsecured debt of more than five thousand dollars (\$5,000.00), other than debts for:~~
- ~~1. money borrowed from a family member from his or her own resources; and~~
 - ~~2. revolving charge accounts.~~

The name of any person related as parent, child, or spouse to the reporting party and his or her employer;

- (n)** ~~the name of each person, business entity, or other organization from whom the reporting party, or his or her spouse, received a gift with an estimated fair market value in excess of one hundred dollars (\$100) during the reporting period and the estimated fair market value of each gift. Excluded from this requirement are:~~
- ~~1. lawful campaign contributions which are reported as required by state statute or local ordinance;~~
 - ~~2. gifts received from family members within the second degree of affinity or consanguinity;~~
 - ~~3. gifts from an individual based on personal friendship who during the preceding three calendar years:~~
 - ~~(a) has not done or sought to do business with the city;~~
 - ~~(b) has not sought city action on any issue before the city council or any city board or commission;~~
 - ~~(c) is not associated with any business or entity that has done or sought to do business with the city; and~~
 - ~~(d) is not associated with any business or entity that has sought city action on any issue before the city council or a city board or commission.~~
 - ~~4. gifts received among and between fellow city employees and city officials;~~
 - ~~5. admission to events in which the reporting party participated in connection with official duties; and~~
 - ~~6. payment of or reimbursement of travel and accommodations expenses accepted in connection with official duties which have been reported under section 2-76 (Travel Reporting Requirements); payment for or reimbursement of expenses for travel in excess of authorized rates under city policy are gifts subject to the reporting requirements under this section.~~

The name of any member of the reporting party's household not disclosed in (m) above;

- (o) Legal residence: by street address, or legal or lot-and-block description, of all real property used by the reporting party as a legal residence located in the State of Texas in which the reporting party or his or her spouse has a leasehold interest, a contractual right to purchase, or an interest as: fee simple owner; beneficial owner; partnership owner; joint owner with an individual or corporation; or owner of more than twenty-five (25) percent of a corporation that has title to real property.**

The complete rewrite of this section reflects the City's recent implementation of an on-line Financial Disclosure reporting capability and insures that the Code requirements and the on-line instructions match.

SECTION 2-76 TRAVEL REPORTING REQUIREMENTS

- (a) Any city official or employee who, in connection with his or her official duties, accepts a trip or excursion involving the gratuitous provision of transportation, accommodations, ~~entertainment~~, meals, or refreshments paid for by a person or entity other than a public agency must file with the City Clerk, before embarking on the travel, a disclosure statement identifying:
- (1) the name of the sponsor;
 - (2) the places to be visited; and
 - (3) the purpose and dates of the travel;
 - (4) the estimated amount of the expenses paid.
- (b) Acceptance of a trip or excursion by Municipal Court Judges and Magistrates, City Manager, Deputy City Manager, City Clerk, Assistant City Clerk, Assistant City Managers, Assistants to the City Manager, and all department heads, assistant department heads, and employees in positions listed on the executive pay plan (Job Class 1000 through 1999) must receive prior written approval of the City Manager. Other personnel must receive written approval by their department director. Boards and commissions members must receive approval by a vote of their board or commission.

The ERB committee desires to remove the word "entertainment" since this would make this section consistent with the gift provisions of the Code. The category "entertainment" should also be removed from the reporting form.

CAMPAIGN FINANCE REGULATIONS

Only one substantive change proposed below; minor administrative changes are shown on red-lined copy attached.

SEC. 2-306 ~~[CAMPAIGN BANK ACCOUNT STATEMENTS]~~ OFFICIAL RECORDS REPOSITORY

~~A candidate for Mayor or City Council or the campaign treasurer, or specific-purpose political action committee registered with the City of San Antonio and formed for the purpose of supporting a candidate for Mayor or City Council, must send a campaign account statement directly to the designated campaign finance enforcement authority once a month within five business days of receiving the statement from the financial institution. The candidate may choose to direct the financial institution to send a copy of the statement directly to the campaign finance enforcement authority.~~

The Office of the City Clerk shall serve as the official records repository for the municipal campaign finance authority.

Attachment D

**Registered Lobbyists as of December 30, 2011
City of San Antonio**

ALLEN BOONE HUMPHRIES ROBINSON, LLP.

3200 SOUTHWEST FREEWAY, SUITE 2600
HOUSTON TX 77207-
Telephone: (713) 860-6408
Nature of Business: Law Firm
Registered: 2/14/2005

GREER PAGAN
ALLEN BOONE HUMPHRIES ROBINSON, LLP
3200 SOUTHWEST FREEWAY, SUITE 2600
HOUSTON TX 77027
Telephone: 713-860-6408
Nature of Business: Agent Of The Registrant
Registered: 2/4/2009
Agent of ALLEN BOONE HUMPHRIES ROBINSON, LLP.

STEPHEN ROBINSON
ALLEN BOONE HUMPHRIES ROBINSON, LLP
3200 SOUTHWEST FREEWAY, SUITE 2600
HOUSTON TX 77027
Telephone: 713-860-6408
Nature of Business: Agent Of The Registrant
Registered: 2/4/2009
Agent of ALLEN BOONE HUMPHRIES ROBINSON, LLP

AT&T INC.

208 S. AKARD
DALLAS TX 75202-
Telephone: (210) 351-2686
Nature of Business: TELECOMMUNICATIONS
Registered: 10/25/2010

RENEE FLORES
208 S. AKARD
DALLAS TX 75202
Telephone: 210-351-2686
Nature of Business: Telecommunications
Registered: 10/25/2010
Agent of AT&T INC.

BALTAZAR R. SERNA, JR.

120 VILLITA
SAN ANTONIO TX 78205-
Telephone: (210) 225-6700
Nature of Business: Attorney at Law
Registered: 1/10/1999

BOBBY PEREZ

600 NAVARRO SUITE 500
SAN ANTONIO TX 78205-
Telephone: (210) 581-5580
Nature of Business: ATTORNEYS AT LAW
Registered: 6/1/2005

Attachment D (Cont.)

BROWN & ORTIZ , P.C.

112 E. PECAN, SUITE 1360
SAN ANTONIO TX 78205-
Telephone: (210) 299-3704
Nature of Business: LAW FIRM
Registered: 11/18/2004

KENNETH BROWN
112 PECAN, STE. 1360
SAN ANTONIO TX 78205
Telephone: (210) 299-3704
Nature of Business: Agent
Registered: 2/10/2004
Agent of BROWN & ORTIZ , P.C.

JAMES GRIFFIN
112 PECAN, STE. 1360
SAN ANTONIO TX 78205
Telephone: (210) 299-3704
Nature of Business: Agent
Registered: 1/16/2008
Agent of BROWN & ORTIZ , P.C.

PAUL JUAREZ
112 PECAN, STE. 1360
SAN ANTONIO TX 78205
Telephone: (210) 299-3704
Nature of Business: Agent
Registered: 1/17/2006
Agent of BROWN & ORTIZ , P.C.

PHILIP MOSS
112 PECAN, STE 1360
SAN ANTONIO TX 78205
Telephone: (210) 299-3704
Nature of Business: Agent
Registered: 2/18/2011
Agent of BROWN & ORTIZ , P.C.

DANIEL ORTIZ
112 PECAN, STE. 1360
SAN ANTONIO TX 78205
Telephone: (210) 299-3704
Nature of Business: Agent
Registered: 11/18/2004
Agent of BROWN & ORTIZ , P.C.

CREDIT SUISSE ASSET MANAGEMENT, LLC

ONE MADISON AVENUE
NEW YORK NY 10010-
Telephone: (212) 325-8656
Nature of Business: ASSET MANAGEMENT
Registered: 6/22/2011

RYAN SCHLITT
ONE MADISON AVENUE
NEW YORK NY 10010
Telephone: 212-325-8656
Nature of Business: Asset Management
Registered: 7/18/2011
Agent of CREDIT SUISSE ASSET MANAGEMENT, LLC

ELISE WOOD
ONE MADISON AVENUE
NEW YORK NY 10010
Telephone: 212-325-8656
Nature of Business: Asset Management
Registered: 6/22/2011
Agent of CREDIT SUISSE ASSET MANAGEMENT, LLC

Attachment D (Cont.)

EARL & ASSOCIATES, P.C.

15303 HUEBNER ROAD, BILG. 15
SAN ANTONIO TX 78248-
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Nature of Business: ATTORNEY AT LAW
Registered: 1/17/1999

DAVID I. EARL
EARL & ASSOCIATES, A PROFESSIONAL CORP.
15303 HUEBNER ROAD, BILG. 15
SAN ANTONIO TX 78248
Telephone: (210) 222-1500
Nature of Business: Agent To The Registrant
Registered: 1/22/2004
Agent of EARL & ASSOCIATES, P.C.

MICHAEL DENUCCIO
EARL & ASSOCIATES, A PROFESSIONAL CORP.
15303 HUEBNER ROAD, BILG. 15
SAN ANTONIO TX 78248
Telephone: (210) 222-1500
Nature of Business: Agent To The Registrant
Registered: 2/4/2011
Agent of EARL & ASSOCIATES, P.C.

FULBRIGHT & JAWORSKI, L.L.P.

300 CONVENT, SUITE #2200
SAN ANTONIO TX 78205-
Telephone: (210) 270-7142
Nature of Business: ATTORNEY
Registered: 2/16/1999

JANE MACON
300 CONVENT STREET, SUITE 2200
SAN ANTONIO TX 78205
Telephone: (210)224-5575
Nature of Business: Lobbyist
Registered: 7/26/2004
Agent of FULBRIGHT & JAWORSKI, L.L.P.

JAMES PLUMMER
300 CONVENT STREET, SUITE 2200
SAN ANTONIO TX 78205
Telephone: (210)224-5575
Nature of Business: Lobbyist
Registered: 7/26/2004
Agent of FULBRIGHT & JAWORSKI, L.L.P.

JAMES SUMMERS
300 CONVENT STREET, SUITE 2200
SAN ANTONIO TX 78205
Telephone: (210)224-5575
Nature of Business: Lobbyist
Registered: 2/1/2006
Agent of FULBRIGHT & JAWORSKI, L.L.P.

GOLDEN STEVES COHEN & GORDON, LLP

300 CONGRESS STREET, SUITE 2600
SAN ANTONIO TX 78205-
Telephone: (210) 745-3700
Nature of Business: LAW FIRM
Registered: 1/19/2006

GRANT JACOBSON
300 CONVENT SUITE 2600
SAN ANTONIO TX 78205
Telephone: 210-745-3700
Nature of Business:
Registered: 7/21/2010
Agent of GOLDEN STEVES COHEN & GORDON, LLP

Attachment D (Cont.)

HABIB H. ERKAN, JR.

630 BROADWAY
SAN ANTONIO TX 78215-
Telephone: (210) 445-4164
Nature of Business: ATTORNEY
Registered: 5/17/2011
HABIB ERKAN
630 BROADWAY
SAN ANTONIO TX 78215
Telephone: 210-445-4164
Nature of Business: Attorney
Registered: 5/17/2011
Agent of HABIB H. ERKAN, JR.

HARRY JEWETT ASSOCIATES

307 W. RHAPSODY DR.
SAN ANTONIO TX 78216-3109
Telephone: (210) 737-3417
Nature of Business: CIVIL ENGINEERING; FIELD SURVEYING; ARCHITECTURE; PLANNING; LAND DEVELOPMENT
Registered: 4/3/2008
HARRY JEWETT
307 W. RHAPSODY DRIVE
SAN ANTONIO TX 78216
Telephone: 210-737-3417
Nature of Business: Engineers, Architects And Planners
Registered: 3/25/2011
Agent of HARRY JEWETT ASSOCIATES

JOE A. GARCIA

919 CONGRESS AVE., SUITE 1500
AUSTIN TX 78233-
Telephone: (210) 650-8666
Nature of Business: LOBBYIST
Registered: 7/8/2011
JOE GARCIA
919 CONGRESS AVE., SUITE 1500
AUSTIN TX 78701
Telephone: 512-476-0616
Nature of Business:
Registered: 7/8/2011
Agent of JOE A. GARCIA

JOSEPH R. KRIER

15060 CADILLAC DRIVE
SAN ANTONIO TX 78248-
Telephone: (210) 367-3644
Nature of Business:
Registered: 2/3/2011
JOSEPH KRIER
15060 CADILLAC DRIVE
SAN ANTONIO TX 78248
Telephone: 210-367-3644
Nature of Business:
Registered: 2/1/2011
Agent of JOSEPH R. KRIER

Attachment D (Cont.)

KAUFMAN & KILLEN, INC.

100 W. HOUSTON, SUITE 1250
SAN ANTONIO TX 78205-
Telephone: (210) 227-2000
Nature of Business: LAW FIRM
Registered: 2/11/1999

WILLIAM T. KAUFMAN
KAUFMAN & ASSOCIATES, INC.
100 W. HOUSTON, SUITE 1250
SAN ANTONIO TX 78205-
Telephone: (210) 227-2000
Nature of Business: Agent Of The Registrant
Registered: 2/2/2004
Agent of KAUFMAN & KILLEN, INC.

ROB KILLEN
KAUFMAN & ASSOCIATES, INC.
100 W. HOUSTON, SUITE 1250
SAN ANTONIO TX 78205
Telephone: (210) 227-2000
Nature of Business: Agent Of The Registrant
Registered:
Agent of KAUFMAN & KILLEN, INC.

ASHLEY FARRIMOND
KAUFMAN & ASSOCIATES, INC
100 W. HOUSTON, SUITE 1250
SAN ANTONIO TX 78205
Telephone: (210) 227-2000
Nature of Business: Agent Of The Registrant
Registered: 9/15/2010
Agent of KAUFMAN & KILLEN, INC

LEONHARD REAL ESTATE SERVICES, INC.

8 DOMINION DRIVE
SAN ANTONIO TX 78257-
Telephone: (210) 218-5450
Nature of Business:
Registered: 11/22/2011

ROBERT LEONHARD
8 DOMINION DRIVE, STE. 145
SAN ANTONIO TX 78257
Telephone: 210-218-5450
Nature of Business:
Registered: 11/22/2011
Agent of LEONHARD REAL ESTATE SERVICES, INC.

M. EDWARD LOPEZ

PO BOX 691262
SAN ANTONIO TX 78269-
Telephone: (210) 697-8658
Nature of Business: LEGISLATIVE/REGULATORY CONSULTING
Registered: 11/19/2007

M. LOPEZ
P.O. BOX 691262
SAN ANTONIO TX 78269
Telephone: 2106978658
Nature of Business: Lobbying/consulting
Registered: 4/10/2010
Agent of M. EDWARD LOPEZ

Attachment D (Cont.)

M.R. GOVERNMENT RELATIONS & MEDIATION (MRGRM)

P.O. BOX 160356
SAN ANTONIO TX 78280-
Telephone: (210) 887-0198
Nature of Business: GOVERNMENT RELATIONS/LOBBYING
Registered: 5/2/2011

MITSUKO RAMOS
P.O. BOX 160356
SAN ANTONIO TX 78280
Telephone: 210-887-0198
Nature of Business: Government Relations/lobbying
Registered: 4/29/2011
Agent of M.R. GOVERNMENT RELATIONS & MEDIATION (MRGRM)

MARTIN & DROUGHT, P.C.

300 CONVENT ST., #2500
SAN ANTONIO TX 78205-
Telephone: (210) 220-1339
Nature of Business: LEGAL SERVICES
Registered: 1/6/2003

FRANK BURNEY
MARTIN & DROUGHT, P.C.
300 CONVENT, 25TH FLOOR
SAN ANTONIO TX 78205-
Telephone: (210) 220-1339
Nature of Business: Agent Of The Registrant
Registered: 1/1/2004
Agent of MARTIN & DROUGHT, P.C.

NIELSEN MERKSAMER PARRINELLO GROSS & LEONI, LLP

2350 KERNER BLVD., STE. 250
SAN RAFAEL CA 94901-
Telephone: (415) 389-6800
Nature of Business: ARCHITECTURE AND ENGINEERING
Registered: 7/1/2010

TOM O'GRADY
2350 KERNER BLVD., STE. 250
SAN RAFAEL CA 94901
Telephone: 415-389-6800
Nature of Business: Architecture And Engineering
Registered: 3/4/2010
Agent of NIELSEN MERKSAMER PARRINELLO GROSS & LEONI, LLP

THOMAS WENDORF
2350 KERNER BLVD., STE. 250
SAN RAFAEL CA 94901
Telephone: 415-389-6800
Nature of Business: Architecture And Engineering
Registered: 7/1/2010
Agent of NIELSEN MERKSAMER PARRINELLO GROSS & LEONI, LLP

PAMELA MADERE

1717 WEST 6TH STREET, #420
AUSTIN TX 78703-
Telephone: (512) 541-3594
Nature of Business:
Registered: 5/19/2011

PAMELA MADERE
1717 WEST 6TH STREET #420
AUSTIN TX 78703
Telephone: 512-541-3594
Nature of Business:
Registered: 5/19/2011
Agent of PAMELA MADERE

Attachment D (Cont.)

PAPE-DAWSON ENGINEERS, INC.

555 EAST RAMSEY
SAN ANTONIO TX 78216-
Telephone: (210) 375-9000
Nature of Business: CIVIL ENGINEERING
Registered: 4/5/2002

GENE DAWSON
SAN ANTONIO TX 78216
Telephone: 210-375-9000
Nature of Business:
Registered: 3/30/2009
Agent of PAPE-DAWSON ENGINEERS, INC

SAM DAWSON
PAPE-DAWSON ENGINEERS, INC.
555 EAST RAMSEY
SAN ANTONIO TX 78216
Telephone: (210) 375-9000
Nature of Business: Agent Of The Registrant(lobbyist)
Registered: 1/11/2005
Agent of PAPE-DAWSON ENGINEERS, INC.

DENNIS RION
PAPE-DAWSON ENGINEERS, INC.
555 EAST RAMSEY
SAN ANTONIO TX 78216
Telephone: (210) 375-9000
Nature of Business: Agent Of The Registrant(lobbyist)
Registered: 1/11/2005
Agent of PAPE-DAWSON ENGINEERS, INC.

PEREZ PROJECT CONSULTING, INC.

5820 IH 10 WEST, SUITE 500
SAN ANTONIO TX 78201-
Telephone: (210) 683-5222
Nature of Business: PROJECT DEVELOPMENT CONSULTING
Registered: 4/6/2011

GABRIEL PEREZ
5820 IH 10 WEST, SUITE 500
SAN ANTONIO TX 78212
Telephone: 210-737-3000
Nature of Business: Project Development Consulting
Registered: 4/6/2011
Agent of PEREZ PROJECT CONSULTING, INC.

PULLMAN CAPPUCCIO PULLEN & BENSON, LLP

2161 NW MILITARY HIGHWAY, SUITE 400
SAN ANTONIO TX 78213-
Telephone: (210) 222-9494
Nature of Business: ATTORNEYS & COUNSELORS
Registered: 1/31/2007

BUCK BENSON
PULMAN, BRESNAHAN, PULLEN & CAPPUCCIO, LLP
Telephone:
Nature of Business:
Registered: 1/31/2007
Agent of PULLMAN CAPPUCCIO PULLEN & BENSON, LLP

Attachment D (Cont.)

PW CHRISTENSEN, PC

1777 NE LOOP 410, SUITE 600

SAN ANTONIO TX 78217-

Telephone: (210) 320-2540

Nature of Business: LAW FIRM

Registered: 2/11/2011

PATRICK CHRISTENSEN

1777 NE LOOP 410, SUITE 600

SAN ANTONIO TX 78217

Telephone: 210-320-2540

Nature of Business: Law Firm

Registered: 2/11/2011

Agent of PW CHRISTENSEN, PC

RUDOLPH F. RODRIGUEZ

719 FINALE COURT

SAN ANTONIO TX 78216-

Telephone: (210) 710-0991

Nature of Business: BUSINESS DEVELOPMENT CONSULTING

Registered: 1/11/2010

RUDOLPH RODRIGUEZ

719 FINALE COURT

SAN ANTONIO TX 78216

Telephone: 210-710-0991

Nature of Business: Business Development Consulting

Registered: 1/11/2010

Agent of RUDOLPH F. RODRIGUEZ

THE FRANCIS LAW FIRM

112 E. PECAN ST., SUITE 200

SAN ANTONIO TX 78205-

Telephone: (210) 222-1100

Nature of Business: ATTORNEYS

BEBB FRANCIS

112 E. PECAN ST. SUITE 200

SAN ANTONIO TX 78205

Telephone: (210) 222-1100

Nature of Business:

Registered: 3/26/1999

Agent of THE FRANCIS LAW FIRM, P.C.

TUGGY ROSENTHAL PAUERSTEIN SANDOLOSKI AGATHER LLP

755 EAST MULBERRY, SUITE 200

SAN ANTONIO TX 78212-

Telephone: (210) 225-5000

Nature of Business: ATTORNEYS AT LAW

BLAKELY FERNANDEZ

TUGGY ROSENTHAL PAUERSTEIN SANDOLOSKI AGATHER LLP

755 EAST MULBERRY, SUITE 200

SAN ANTONIO TX 78212

Telephone: (210) 225-5000

Nature of Business: Attorney At Law

Registered: 3/19/2008

Agent of TUGGY ROSENTHAL PAUERSTEIN SANDOLOSKI AGATHER LLP

JONATHAN STARR

755 E. MULBERRY, SUITE 200

SAN ANTONIO TX 78212

Telephone: 210-225-5000

Nature of Business: Law Firm

Registered: 8/26/2010

Agent of TUGGEY ROSENTHAL PAUERSTEIN SANDOLOSKI AGATHER LLP

Attachment D (Cont.)

TIM TUGGEY

TUGGY ROSENTHAL PAUERSTEIN SANDOLOSKI AGATHER LLP
755 EAST MULBERRY, SUITE 200
SAN ANTONIO TX 78212
Telephone: (210) 225-5000
Nature of Business: Attorney At Law
Registered: 3/19/2008
Agent of TUGGY ROSENTHAL PAUERSTEIN SANDOLOSKI AGATHER LLP

WINSTEAD PC

401 CONGRESS AVENUE, SUITE 2100
AUSTIN TX 78701-
Telephone: (512) 370-2973
Nature of Business: LAW
Registered: 10/14/2011
JOHN DONISI
401 CONGRESS AVENUE, SUITE 2100
AUSTIN TX 78701
Telephone: 512-370-2973
Nature of Business: Law
Registered: 10/14/2011
Agent of WINSTEAD PC
STEPHEN DRENNER
401 CONGRESS AVENUE, SUITE 2100
AUSTIN TX 78701
Telephone: 512-370-2973
Nature of Business: Law
Registered: 10/14/2011
Agent of WINSTEAD PC
MICHELE HAUSSMANN
401 CONGRESS AVENUE, SUITE 2100
AUSTIN TX 78701
Telephone: 512-370-2973
Nature of Business: Law
Registered: 10/14/2011
Agent of WINSTEAD PC

ZACHRY INC.

P. O. BOX 240130
SAN ANTONIO TX 78224-0130
Telephone: (210) 258-2662
Nature of Business: CONSTRUCTION SERVICES AND PROJECT DEVELOPMENT
Registered: 4/30/1999
TARA SNOWDEN
ZACHRY, INC.
P.O. BOX 240130
SAN ANTONIO TX 78224-0130
Telephone: (210) 258-2662
Nature of Business: Agent Of The Registrant
Registered: 1/15/2009
Agent of ZACHRY INC.
VICTORIA WADDY
ZACHRY, INC.
P.O. BOX 240130
SAN ANTONIO TX 78224-0130
Telephone: (210) 258-2662
Nature of Business: Agent To The Registrant
Registered: 1/15/2002
Agent of ZACHRY INC.

Attachment E

2011 Ethics & Campaign Finance Training

Twice monthly: Mandatory New Employee Orientation Ethics Presentation

Mandatory Ethics Refresher Training Presentation 45 sessions 03-10-11 to 06-30-11

Name of Training	Hrs	General Category	Date
Boards and Commissions Liaisons Financial Disclosure Workshop (CAO, OCC)	1.5	Ethics, financial disclosure	<u>01</u> -12-11
Open Meetings and Ethics	1.5	Open Meetings, Ethics	<u>01</u> -23-11
Planning Commission Workshop			
Boards and Commissions Liaisons (CAO, OCC)	1.5	Ethics, Open Meetings, (two sessions)	<u>02</u> -23-11
Municipal Leadership Institute (CAO, OCC)	3.0	Ethics, Open Meetings, Parliamentary Procedure	<u>03</u> - <u>01</u> -11
The McGrinchy Code: Nixon	1.0	CLE – 901196077	<u>03</u> -12-11
AIA (Architects) Ethics Workshop	1.0	Ethics in government	<u>04</u> -30-11
Ethics Follies	3.0	Professional Ethics	<u>07</u> -26-11
SABA- Real Estate Attorneys	1.0	Ethics Code, Campaign Finance Code Update	<u>08</u> -12-11
Hispanic Chamber of Commerce Ethics Workshop	1.0	Ethics in government	<u>08</u> -13-11
Gifts, Trips and Conflicts			<u>08</u> -13-11
Ethics Review Board Retreat	1.5	Ethics Code, Campaign Finance Code	<u>08</u> -30-11
Municipal Leadership Institute (CAO, OCC)	3.0	Ethics, Open Meetings, Parliamentary Procedure	<u>09</u> -21-11
Candidate Workshop (CAO, OCC)	2.0	Ethics, Campaign Finance Election Code for Candidates	10-25-11
St. Mary's University Political Science Class	1.0	Campaign Finance Reform	10-26-11
Lobbyist Workshop (CAO, OCC)	2.0	Ethics, lobbyist regulations for lobbyists	11-15-11